

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
Plaintiff,)	
)	
v.)	
)	
ROGER KNOX, WINTERCAP SA)	
MICHAEL T. GASTAUER,)	
WB21 US INC., SILVERTON, SA INC.,)	Civil Action No. 18-cv-10258 (RGS)
WB21 NA INC., C CAPITAL)	
CORPORATION, WINTERCAP)	
SA INC., AND B2 CAP INC.)	
Defendants,)	
)	
RAIMUND GASTAUER, SIMONE)	
GASTAUER FOEHR, B21 LTD.,)	
SHAMAL INTERNATIONAL FZE,)	
AND WB21 DMCC,)	
Relief Defendants.)	
)	

DECLARATION OF PHILLIP GASTAUER

I, Phillip Gastauer, under threat of penalty for perjury, declare:

1. I make this declaration in lieu of an oath in support of WB21 DMCC's motion to dismiss the complaint for lack of personal jurisdiction. I am a Director of WB21 DMCC, I am authorized to speak on its behalf, I am over eighteen years old and have personal knowledge of the facts contained in this declaration.
2. I understand that WB21 DMCC has been named as a "relief defendant."
3. WB21 DMCC was formed as a Company with Limited Liability in Dubai, UAE, on August 17, 2017, Certificate No. DMCC93238 (*See Exhibit A*).

4. WB21 DMCC has never conducted business in Massachusetts or the United States.

5. WB21 DMCC has never had a bank or investment account in Massachusetts or the United States.

6. WB21 DMCC has paid no taxes in the United States.

7. WB21 DMCC has no contracts with U.S. parties.

8. WB21 DMCC has not sued anyone in the United States.

I declare under threat of penalty for perjury under the laws of the United States that the foregoing is true and correct.

Signed on April 4, 2019.



Phillip Gastauer